

White & Case LLP
701 Thirteenth Street, NW
Washington, DC 20005

Christopher M. Curran (*pro hac vice*)

ccurran@whitecase.com

Lucius B. Lau (*pro hac vice*)

alau@whitecase.com

Dana E. Foster (*pro hac vice*)

defoster@whitecase.com

White & Case LLP

701 Thirteenth Street, N.W.

Washington, DC 20005

Telephone: (202) 626-3600

Facsimile: (202) 639-9355

*Counsel to Defendants Toshiba Corporation,
Toshiba America, Inc., Toshiba America
Information Systems, Inc., Toshiba America
Consumer Products, LLC, and Toshiba America
Electronic Components, Inc.*

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN FRANCISCO DIVISION)

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

Case No. 07-5944 SC
MDL No. 1917

This Document Relates to:

Best Buy Co., Inc., et al. v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-05513

Best Buy Co., Inc., et al. v. Technicolor SA, et
al., Case No. 13-cv-05264

Alfred H. Siegel, as Trustee of the Circuit City
Stores, Inc. Liquidating Trust v. Hitachi, Ltd., et
al., Case No. 3:11-cv-05502

CompuCom Systems, Inc. v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-06396

Costco Wholesale Corp. v. Hitachi, Ltd., et al.,
Case No. 3:11-cv-06397

**DECLARATION OF
LUCIUS B. LAU IN SUPPORT OF
THE TOSHIBA DEFENDANTS'
ADMINISTRATIVE MOTION TO
FILE DOCUMENTS UNDER SEAL
PURSUANT TO CIVIL LOCAL
RULES 7-11 AND 79-5(d)**

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS' ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944-SC, MDL No. 1917

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2 *Electrograph Systems, Inc., et al. v. Hitachi,*
3 *Ltd., et al.,* Case No. 3:11-cv-01656
4 *Electrograph Systems, Inc., et al. v. Technicolor*
5 *SA, et al.,* Case No. 3:13-cv-05724
6 *Interbond Corp. of America v. Hitachi, Ltd., et*
7 *al.,* Case No. 3:11-cv-06275
8 *Interbond Corp. of America v. Technicolor SA,*
9 *et al.,* Case No. 3:13-cv-05727
10 *Office Depot, Inc. v. Hitachi, Ltd., et al.,* Case
11 No. 3:11-cv-06276
12 *Office Depot, Inc. v. Technicolor SA, et al.,*
13 Case No. 3:13-cv-05726
14 *P.C. Richard & Son Long Island Corp., et al. v.*
15 *Hitachi, Ltd., et al.,* Case No. 3:12-cv-02648
16 *P.C. Richard & Son Long Island Corp., et al. v.*
17 *Technicolor SA, et al.,* Case No. 3:13-cv-05725
18 *Sears, Roebuck & Co. and Kmart Corp. v.*
19 *Chunghwa Picture Tubes, Ltd., et al.,* Case No.
20 3:11-cv-05514
21 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
22 *et al.,* Case No. 3:11-cv-05514
23 *Target Corp. v. Technicolor SA, et al.,* Case No.
24 3:13-cv-05686
25 *Tech Data Corp., et al. v. Hitachi, Ltd., et al.,*
26 Case No. 3:13-cv-00157
27 *Schultze Agency Services, LLC on behalf of*
28 *Tweeter Oopco, LLC and Tweeter Newco, LLC*
v. Hitachi, Ltd., et al., Case No. 3:12-cv-02649
Schultze Agency Services, LLC on behalf of
Tweeter Oopco, LLC and Tweeter Newco, LLC
v. Technicolor SA, et al., Case No. 3:13-cv-
05668

ViewSonic Corp. v. Chunghwa Pictures Tubes, Ltd., et al., Case No. 3:14-cv-02510

I, Lucius B. Lau, hereby declare as follows:

1. I am an attorney with the law firm of White & Case LLP, counsel for Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic Components, Inc. (collectively, the “Toshiba Defendants”).

2. I submit this declaration in support of the Toshiba Defendants’ Administrative Motion to File Documents Under Seal Pursuant to Civil Local Rules 7-11 and 79-5(d), dated November 7, 2014, filed contemporaneously herewith. I have personal knowledge of the facts stated herein, and I could and would competently testify thereto if called as a witness.

3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306) (the “Stipulated Protective Order”).

4. Plaintiffs Best Buy Co., Inc., Best Buy Purchasing, LLC, Best Buy Enterprise Services, Inc., Best Buy Stores, L.P., BestBuy.com, L.L.C., and Magnolia Hi-Fi, Inc. served the Report of Alan S. Frankel, Ph.D., dated April 15, 2014, that they designated as “Highly Confidential” under the Stipulated Protective Order.

5. The Best Buy, Circuit City, CompuCom, Costco, Electrograph, Interbond, Office Depot, P.C. Richard, Sears, Kmart, Target, Tech Data and Tweeter Plaintiffs served the Expert Report of Dr. James. T. McClave, dated April 15, 2014, that they designated as “Highly Confidential” under the Stipulated Protective Order.

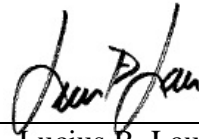
6. On November 7, 2014, the Toshiba Defendants filed the Defendants’ Notice of Motion and Motion for Summary Judgment on Plaintiffs’ Umbrella Damages (“Defendants’ Motion”) and the Declaration of Lucius B. Lau in Support of the Defendants’ Motion, and attached, as Exhibits B and C, certain documents which the Best Buy, Circuit City, CompuCom, Costco, Electrograph, Interbond, Office Depot, P.C. Richard, Sears,

1 Kmart, Target, Tech Data and Tweeter Plaintiffs designated as “Highly Confidential.” As
2 such, the Toshiba Defendants filed these materials under seal.

3 7. Portions of the Defendants’ Motion contain quotations from, and discussions
4 of, the above-specified “Highly Confidential” material. As such, the Toshiba Defendants
5 filed the Defendants’ Motion under seal.

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7 I declare under penalty of perjury under the laws of the United States of America that
8 the foregoing is true and correct.

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10 Executed this 7th day of November, 2014, in Washington, D.C.

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15 Lucius B. Lau

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA DEFENDANTS’ ADMINISTRATIVE
MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

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